

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

William R. Hall, Jr., individually)	Civil Action No.
and as a representative of the classes,)	1:18-cv-05141-JPB-AJB
)	
Plaintiff,)	
)	
v.)	
)	
TransUnion Rental Screening)	
Solutions, Inc.)	
)	
Defendant.)	

CONSENT MOTION TO SUSPEND EXPERT DISCLOSURE DEADLINE

Plaintiff William R. Hall, Jr. (“Plaintiff”), by and through his counsel, pursuant to LR 26.2(B), respectfully moves the Court to suspend the current expert deadlines. Defendant TransUnion Rental Screening Solutions, Inc. consents to the relief sought by this motion. In support of this motion, Plaintiff states as follows:

1. Plaintiff and Defendant have been meeting and conferring regarding the production of a sample of certain data from Defendant’s systems. Specifically, Plaintiff has advised Defendant that he intends to amend his definition of the putative class alleged in Paragraph 47 of the Complaint (ECF No. 1), and to amend his theory of liability for the related claim alleged in Count I of the Complaint. Plaintiff has also requested that Defendant provide him with an export of certain

data that he believes is relevant to the proposed amended class definition and amended related claim. By his request, Plaintiff indicated that he would initially accept a sample data export, and Defendant agreed to provide a sample data export.

2. The parties have been diligently working on this issue in a cooperative manner. To identify and assemble the sample data export proposed by Plaintiff, Defendant was required to identify current and historical data maintained in separate systems and databases, create custom queries to extract certain of that data, and manually identify and gather other such data. This process has been time-consuming. Defendant expects to produce an initial data sample by the end of this week.

3. After the sample is produced, Plaintiff will need to review the data sample and information regarding how the sample was generated, likely with the assistance of experts. In particular, Plaintiff believes that expert assistance may be required to evaluate the data to determine if it is a large enough sample to be representative, and to determine if Plaintiff contends that additional and/or different data is needed.

4. After Plaintiff completes his initial data review, the parties have agreed to meet and confer regarding whether Plaintiff seeks the production of additional or supplemental data, and, if so, whether Defendant is willing and/or

able to produce same. Depending on what (if any) additional data Plaintiff requests, Defendant may need to consult with its own experts and/or internal personnel, and will also need time to identify, retrieve, and export any additional data it agrees to produce to Plaintiff. Further, in the event the parties are unable to reach agreement on the scope of the data export, they may need to seek assistance from the Court.

5. By its order of July 25, 2019 (ECF No. 37), this Court extended the schedule in this matter and set the following discovery deadlines: September 17, 2019, for Plaintiff to designate experts; October 29, 2019, for Defendant to designate experts; and December 3, 2019, for the close of discovery and to file motions to compel.

6. The process outlined herein cannot be completed by the current deadline for Plaintiff to designate experts, which is September 17, 2019. Similarly, if Plaintiff does not designate experts by September 17, then Defendant will not be in a position to designate its experts on October 29, 2019.

7. In light of this ongoing and cooperative process of data production, the parties propose suspending the current expert deadlines, and further propose submitting a status report on October 1, 2019 that will propose new deadlines for expert disclosures.

8. At the present time, the parties do not request that the Court extend the discovery deadline or any other deadlines. However, if Plaintiff seeks and/or Defendant agrees to produce additional data, one or both parties may request an extension of the discovery deadline to allow for such production.

9. This Motion is timely made under LR 26.2(B) as it is made prior to the current expiration of the discovery period in this matter.

Respectfully submitted,

Date: September 13, 2019

/s/ E. Michelle Drake
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2019, I electronically filed the foregoing CONSENT MOTION with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

Dated: September 13, 2019

/s/ E. Michelle Drake

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